

**Exhibit 2**

**Notice of Motion and Opportunity to Object**

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN**

In re

CITY OF DETROIT, MICHIGAN,

Debtor.

)  
) Chapter 9  
)  
) Case No. 13-53846  
)  
) Hon. Steven W. Rhodes  
)

---

**NOTICE OF THE MOTION OF SYNCORA GUARANTEE  
INC. AND SYNCORA CAPITAL ASSURANCE  
INC. FOR AUTHORITY TO ISSUE DOCUMENT AND  
DEPOSITION SUBPOENAS TO THE DEBTOR, THE EMERGENCY  
MANAGER, AND CERTAIN OF THE DEBTOR'S ADVISORS  
PURSUANT TO FEDERAL RULE OF BANKRUPTCY PROCEDURE 2004**

---

**PLEASE TAKE NOTICE** that on October 23, 2013, Syncora Guarantee Inc. and Syncora Capital Assurance Inc. (together "Syncora") filed the *Motion of Syncora Guarantee Inc. and Syncora Capital Assurance Inc. for Authority to Issue Document and Deposition Subpoenas to the Debtor, the Emergency Manager, and Certain of the Debtor's Advisors Pursuant to Federal Rule of Bankruptcy Procedure 2004* (the "Rule 2004 Motion") in the United States Bankruptcy Court for the Eastern District of Michigan (the "Bankruptcy Court") seeking entry of an order authorizing Syncora to issue document and deposition subpoenas to the Debtor, the emergency manager, and certain of the Debtor's advisors to obtain additional information regarding the process and substance of soliciting, negotiating, and approving proposals for debtor in possession financing.

**PLEASE TAKE FURTHER NOTICE** that **your rights may be affected by the relief sought in the Rule 2004 Motion. You should read these papers carefully and discuss them with your attorney, if you have one. If you do not have an attorney, you may wish to consult one.**

**PLEASE TAKE FURTHER NOTICE** that if you do not want the Bankruptcy Court to grant Syncora's Rule 2004 Motion, or you want the

Bankruptcy Court to consider your views on the Rule 2004 Motion, by **October 25, 2013 at 4:00 p.m. (EDT)** you or your attorney must:<sup>1</sup>

1. File with the court a written response to the Rule 2004 Motion, explaining your position explaining your position with the Bankruptcy Court electronically through the Bankruptcy Court's electronic case filing system in accordance with the Local Rules of the Bankruptcy Court or by mailing any objection or response to:<sup>2</sup>

United States Bankruptcy Court  
Theodore Levin Courthouse  
231 West Lafayette Street  
Detroit, MI 48226

You must also serve a copy of any objection or response upon:

James H.M. Sprayregen, P.C.  
Ryan Blaine Bennett  
Stephen C. Hackney  
KIRKLAND & ELLIS LLP  
300 North LaSalle  
Chicago, Illinois 60654  
Telephone: (312) 862-2000  
Facsimile: (312) 862-2200

- and -

Stephen M. Gross  
David A. Agay  
Joshua Gadharf  
MCDONALD HOPKINS PLC  
39533 Woodward Avenue  
Bloomfield Hills, MI 48304  
Telephone: (248) 646-5070  
Facsimile: (248) 646-5075

---

<sup>1</sup> Concurrently herewith, Syncora is seeking expedited consideration and shortened notice of the Rule 2004 Motion. If the Court grants such expedited consideration and shortened notice, Syncora will file and serve notice of the new response deadline.

<sup>2</sup> A response must comply with F. R. Civ. P. 8(b), (c) and (e).

2. If an objection or response is timely filed and served, the clerk will schedule a hearing on the Rule 2004 Motion and you will be served with a notice of the date, time and location of the hearing.

**PLEASE TAKE FURTHER NOTICE that if you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the Rule 2004 Motion and may enter an order granting such relief.**

Dated: October 23, 2013

Respectfully submitted,

**KIRKLAND & ELLIS LLP**

By: /s/ Ryan Blaine Bennett

James H.M. Sprayregen, P.C.

Ryan Blaine Bennett

Stephen C. Hackney

KIRKLAND & ELLIS LLP

300 North LaSalle

Chicago, Illinois 60654

Telephone: (312) 862-2000

Facsimile: (312) 862-2200

- and -

Stephen M. Gross

David A. Agay

Joshua Gadharf

MCDONALD HOPKINS PLC

39533 Woodward Avenue

Bloomfield Hills, MI 48304

Telephone: (248) 646-5070

Facsimile: (248) 646-5075

*Attorneys for Syncora Guarantee Inc. and  
Syncora Capital Assurance Inc.*